

Will Brown

-v- Answer and counter-claim

John Burgin &c

1..... The defendants John Burgin and White & McCroskey, for answer and counter-claim against the plaintiff, deny that John Burgin is indebted to the plaintiff in the sum of \$100.00 or any other sum or at all, or for a balance due on payment of tobacco crop raised on Burgin's farm, or any sum or for anything; deny that John Burgin has failed or refused to pay the same.

2x 2..... For further answer and counterclaim, the defendants, White & McCroskey and John Burgin, state that in the year 1914 the plaintiff raised on Burgin's farm a crop of tobacco under a contract and arrangement by which the tobacco was to be sold by Burgin and Brown to receive one-half thereof less advances made by the landlord.

They state that on Dec. 20, 1913 the plaintiff executed and delivered to White & McCroskey his written promisory note of that date due and payable one year thereafter by which he agreed and promised to pay to them \$146.78 with 6% from date ; that said note is long past due and no part thereof has ever been paid, said note is filed as a part here of marked note.

They state that on ~~xxxx~~ or about the day of 191